

QUALITY REPORT

Gullubag 96 MW Hydro Electric Power Plant Project, Turkey

VCS-391 · VCS · Türkiye

Report ID: CM-075D695F · Generated: 2026-04-02 · Scoring Methodology: General v2.0

6.3 Overall Score out of 10	■ Integrity (35%)	6.2
	■ Transparency (25%)	6.4
	■ Claim Safety (25%)	5.6
	■ Documentation (15%)	7.6

Weights: Integrity 35% · Transparency 25% · Claim Safety 25% · Documentation 15%

Assessment Summary

The project shows several integrity positives for a grid-connected renewable energy activity under ACM0002, including VVB-confirmed additionality and matching claimed vs verified reductions in the most recent record. However, major cross-document inconsistencies in reported emission reductions and even the crediting period create over-crediting and reliability concerns that reduce confidence in the record.

Project Details

Registry	Verra (VCS)
Registry ID	VCS-391
Sector	renewable_energy
Country	Türkiye
Vintage	2017
Project Methodology	ACM0002 10
Crediting Period	2012 — 2022
VVB	Carbon Check (India) Private Limited
Verified ERs	179,252 tCO ₂ e
Monitoring Period	2020 — 2022
Confidence	High
Documents Reviewed	14 documents reviewed
Scored	2026-04-02

Red Flags

- Large contradiction in reported verified/claimed emission reductions (179,252 vs 800,935) across validation reports, indicating potential over-crediting or document/version confusion
- Crediting period is inconsistent across documents (2012–2022 vs 2022–2032), creating uncertainty about eligibility and issuance boundaries

Score Breakdown

Integrity — 6.2 / 10

- + The validation/verification record indicates additionality was confirmed by the VVB using an investment test.
- Key quantitative elements are inconsistent across documents (emission reductions and crediting period), undermining baseline/quantification reliability.

Additionality appears reasonably supported: the validation/verification record confirms additionality via an investment test and indicates it was confirmed by the VVB. Leakage treatment is reported as a 0% deduction with a quantified justification in the monitoring report (2022-11-02), and no reversal events are reported (appropriate for an avoidance renewable project). However, integrity is weakened by major inconsistencies across documents on the magnitude of emission reductions and the stated crediting period, which raises concerns about baseline/quantification reliability.

Transparency — 6.4 / 10

- + A named VVB (Carbon Check) and a clearly stated monitoring period (2020-05-01 to 2022-03-22) support traceability.
- Conflicting figures across official documents reduce MRV clarity even where a number is reported.

The extracted record provides a named VVB (Carbon Check (India) Private Limited), a specific monitoring period (2020-05-01 — 2022-03-22), and matching claimed vs verified reductions in the most recent record (179,252). The evidence set includes core document types (PDD, validation report, monitoring report, issuance), supporting auditability. Transparency is reduced because key headline numbers and even the crediting period differ across official documents, making it hard for third parties to reconcile what was actually validated/verified.

Claim Safety — 5.6 / 10

- + The most recent record shows claimed and verified reductions match (179,252), lowering the risk of simple overstatement for that period.
- CORSIA and CCP status were not found in the extracted record, and ERR/crediting-period contradictions increase greenwashing/over-crediting risk.

Over-crediting/greenwashing risk is elevated by the contradiction between 179,252 and 800,935 tCO₂e reported as claimed/verified in different validation reports, even though the latest extracted values match each other. CORSIA eligibility and CCP status were not found in the extracted record, so buyers cannot easily assess aviation/ICVCM-related claim constraints. The baseline is project-specific (rather than a standardized/jurisdictional baseline), which typically carries higher over-crediting sensitivity than standardized approaches.

Documentation — 7.6 / 10

- + Document set is relatively complete (PDD, validation report, monitoring report, issuance) with high extraction confidence and 10 documents used.
- Contradictions between documents suggest version control and record consistency problems despite good document coverage.

Documentation coverage is relatively strong: 10 documents were used, including PDD, validation report, monitoring report, and issuance, and the minimum extraction confidence is high (no indication of unreadable key documents). The monitoring report is dated 2022-11-02 and includes key MRV elements such as the monitoring period and grid emission factor (0.616). Nonetheless, repeated contradictions across documents indicate record-management issues that reduce confidence despite the breadth of documentation.

Risk Indicators

● Additionality	VVB-confirmed investment test
● Permanence	Avoidance project; no reversals reported
● Leakage	0% deduction with inconsistent treatment across reports
● Baseline	Project-specific baseline; reassessment timing not fully clear
● Safeguards	FPIC and grievance mechanism documented
● Double-claim	CORSIA/CCP status not found in record

What Would Improve This Score

→ Publish a clear reconciliation note mapping each ERR figure (179,252 vs 800,935) to the exact scope, monitoring period, and document version, and confirm which figure was issued on the registry.

→ Clarify crediting-period history (original vs renewed period) with registry links and explicit statements in the latest verification/monitoring package to remove eligibility-boundary ambiguity.

Documents Reviewed

- Issuance Representation
- Monitoring Report
- Communications Agreement
- Registration Representation
- Project Description
- Verification Report
- Verification Representation
- Validation Representation
- Validation Report

Disclaimer

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